

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

Calvin ALPHONSE LBB #152056
Full name and prison number
of plaintiff(s)

v. ALABAMA DEPT. OF CORRECTIONS
WARDEN John Cummins II, ET AL., CAPTAIN

HORACE BURTEN, Classifications DEBRA

MARTIN, SGT. UZIAN LANGFORD, F.L.C.

P.O. B. 220410, DEARBURG, AL 36022

REQUEST TO AMEND OTHER'S
Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

RECEIVED

2007 JAN 29 A 11:04 2:07cv82-T
CIVIL ACTION NO. _____
(To be supplied by Clerk of
U.S. District Court)
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO (✓)

B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO (✓)

C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if
state court, name the county) _____

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT FRANK LEE YOUTH CENTER
P.O. BOX 220410, DEATSVILLE, AL 36022
 PLACE OF INSTITUTION WHERE INCIDENT OCCURRED FRANK LEE YOUTH
CENTER, P.O. BOX 220410, DEATSVILLE, AL 36022

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

WARDEN	NAME	ET AL	ADDRESS
1.	<u>JOHN Cummins II</u>	WARDEN	<u>5375 Ingram Road, Deatsville, AL 36022</u>
2.	<u>CAPTAIN HORACE BURTON</u>		<u>5375 Ingram Road Deatsville AL 36022</u>
3.	<u>SGT. ULIAM JACKSON</u>	^{OR LANGFORD}	<u>5375 Ingram Road, Deatsville, AL 36022</u>
4.	<u>DEBRA MARTIN</u>		<u>5375 Ingram Road, Deatsville, AL 36022</u>
5.			
6.	<u>REQUEST TO AMEND OTHER'S TO this 1983-Complaint at a later date</u>		

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED DECEMBER 29, 2006
FRIDAY

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: SGT. JACKSON or Langford verbally threaten me, the petitioner, for performing a job description; that I had been appointed by SGT. Langford and the Job Board to do. SGT. Langford later in January 04, 2007 later terminated the petitioner from the Job As Law Library Clerk. For performing the job that the petitioner was assigned to perform, which was to assist other inmates legally. Also SGT. Langford conspired with the warden and Captain to deprive the petitioner of his civil rights by use of Intimidation.

Cont
V.

STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATIONS THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

Ground one: By not providing an Adequate Law Library, suitable for the petitioner to access the courts. As required by law, of which all the defendants on the cover page were knowledgeable about. SGT. LANGFORD was NEVER qualified as required by the ALABAMA Department of Correction regulation's for that job description. That SGT. Langford held at Frank Lee youth Center. Which was Law Library Supervisor. Which caused harm to the petitioner and other inmates, Attempting to Access the Courts. The Defendant's 1, 2, 3, Cummin's Burton, Langford. Devised this scheme to mislead the Petitioner and others, in violation's of the ALABAMA Department of Correction's Policy and Procedure's in regard's to establishing a Legal Adequate Law Library and it's governing officials. Out of Disrespect and selfish disregard's for Human Life of a prisoner. Also this intentional disregard, expresses their true character. And Respect of Authority that they are accountable to. When they are not monitored they will Abuse their authority of the Law. These named defendant's in this Civil Action willfully violated as many ALABAMA D.O.C Administration Regulation's, Procedure's and Policies. For the Standard Operating Procedure set down by the A.L.D.C. Legal Division that set the Policy as to the Required level set by the Federal statute for Prisoner's Rights to Access the Courts. In order for the Defendant's to carry out this Deprivation of the petitioner Constitutional Rights. The Defendant's hide Administration Regulation's and Standard Operating Procedure's as pertaining to the Law Library and the Facility. Making the rules as they so please. In the process inflicting great emotional

harm upon the Petitioner and other inmates, resulting in numerous Due Process violations. SGT. Langford on her superior's, neither honored the Petitioner or other inmates request for Law books or other Law material not stocked in the Law Library or on the Lexis Series. From June 2004, until recently due to and outside source contacting the AL.D.C. Commissioner ET. AL. Office with a complaint on December 29, 2006. The Petitioner had attempted to have the Deprivation Addressed. Numerous times, but the Supervisor mislead the Petitioner and other's as to the issue. Then once on the verge of being exposed. The defendant's singled out the petitioner for helping other inmates with legal issues. And subjected the Petitioner to cruel and unusual Punishment by threats and intimidation with outrageous verbal remarks. And other unprofessional conduct. Their purpose for conducting themselves in this unprofessional manner. Is to provoke the petitioner or other inmates. Into retaliating in some form. So that they the defendant's, can justify a Rule violation of some sort. And to be able to justify the using of force to bring the petitioner or other's under control. Then they would falsify Incident Reports, To cover-up for any wrong's that they instigated. As stated before, I request of the Court to let me the petitioner Amend, at a later date. Sworn Affidavit's from other inmates and the petitioner. Of Incident's in which exactly what is stated occurred. Also request to be allowed time to amend these sworn Affidavit's from witnesses. Also the Petitioner, Requests that the Court take into consideration that, the petitioner is not an Attorney. And has limited knowledge of the Law. But has the Common Sense to know when his Constitutional Right has been violated. And is requesting a Federal Investigation of this complaint and the Institution where

These Constitution violations occur daily, THE STAFF here at Frank Lee Youth Center mistreats the prisoners, by not placing the S.O.P. Rules in view or post them. So that they can be known. Here the only time a prisoner's know what's going on is when he is in front of the Disciplinary Board or has received a citation or other. The Library Book's of new laws the Administration keeps them for their reading. The only way to combat this problem is for the Federal Court's to send a U.S. Marshal Investigation Team in here to talk to the Complainant or Petitioner. Do a walk through talking with the 284 prisoners here in a private or one on one setting. Because if done in the view of the Correctional Officer's the prisoners are going to be intimidated by them the Board and Authorities here present and stare's. If not that, the petitioner has some names also of some prisoners whom have ended their sentence's but are willing to give statement's. About the Abuse here, Why can't a prisoner just serve his sentence in peace without the Authorities. Being the Judge, Jury, and Executioner. The Petitioner has done nothing to cause this sort of cruel punishment. I've have only assisted other inmates to the best of my knowledge, with legal matters. From my prior experience's. Provoking the SGT. to change my institutional job. Also to degrade me personally, And other.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

These incidents have occurred since, I have first come to this facility in June 2006. If the date is correct. But most has mainly occurred since Dec. 29, 2006 - Thru. 01/04/07. At Frank Lee Youth Center by means of schemes, misleading information, trickery, threats and intimidation by the listed personnel on the cover page of this Complaint Commin's, Burton, Langford and Martin.

GROUND TWO: ALL HAVE CONSPIRED AND DEPRIVED THE PETITIONER OF his Civil Rights An 1st Amendment 5th Amendment 6th Amendment 8th Amendment 14th Amendment Rights

SUPPORTING FACTS: DUE Process violation, Constant threats. And tactics to pressure inmates and Petitioner into violating the rules. Being deprived of inmates rights, Privileges and immunities guaranteed by the Constitution

GROUND THREE: Petitioner Request to be allowed to Amend the Statement of the Incidents with Classification Specialist Debra Martin After he has off been removed from the facility because of her connections to high officials

SUPPORTING FACTS: within the D.C. for Alabama Command Structure, which allow's her to do whatever she please's without correction from Superior's. Because of close ties with them in society. Also this possibility involve's Postal official in the area around Frank Lee Youth Center. Petitioner Request to Amend this information at a later time. Because it will require an undercover investigation. To be exposed but has occurred.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Request to be removed from this facility immediately under U.S. Marshal Protection
also have the witnesses removed also, And An investigation be started
immediately with statements taken from every inmate at the facility. Also
sanctions be imposed. So that this never occurs again, And the guilty parties
be removed from their job description. And the state of Alabama Tax payers
reimbursed. And Counsel appointed Car G. Lee Pro. Se
for the Petitioner Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on 01/04/07 (Date)

Car G. Lee
Signature of plaintiff(s)

ALVIN A. LEE - 182056, A3332
FRANK LEE YOUTH CENTER
P.O. B. 220410
DEATSVILLE, AL 36022

2007

LEGAL
MAIL

LEGAL MAIL

UNITED STATES DISTRICT COURTS

MIDDLE DISTRICT OF ALABAMA

UNITED STATES COURTHOUSE

15 LEE ST.

MONTGOMERY, ALABAMA 36104

AFFIDAVIT

2:07 CV 82-T

I A PRISONER AT FRANK LEE YOUTH CENTER, Is signing this sworn Affidavit to the conditions and Abusive behavior of THE PRISON STAFF here at F. L. Y. C. THE Accused being

① WARDEN John Cummins II, ② CAPTAIN HORACE BURTON ③ SGT. VERNON LANGFORD, ④ Classification Specialist Debra MARTIN

ALL of the above have conspired to Deprive the Prisoner's of their Civil and Constitutional Rights and ENCOURAGED hatred against Society. By their methods of degrading prisoners Confined here at F. L. Y. C. And infliction of punishment that is pointless infliction of suffering. Inmate's are forced by SGT. Langford to work beyond their strengths, in violation of their Religious beliefs. Ms Debra Martin force Inmate and the Petitioner to be idle, when it's comes to Rehabilitation programs. The sanitation conditions are inadequate at night, there is one toilet, face basin, one mirror, to serve 76 prisoners this housed in CELL #3. And by the warden and Captain being in charge of the Latrine they had to be aware or was negligent in there job description if they say. They did not know what was going on. Also there is no policy for governing the Handicap or Disabilities Act. This Latrine is in violation of the Handicap laws. It is without Any of the necessities providing for the Handicap. And there are several Handicap inmate's here. I the PETITIONER on any of the signer's to this Affidavit. Are not being forced or persuaded by threat or any other means. Except of our own free will to sign this Affidavit. The Petitioner is correct as to the conditions ALLEGATION's against SGT. Langford, and the Supervisor's Also Classification Specialist Debra Martin. By no means are we attempting to disrupt the Security or Cause anyone harm. This is not a Class-Action Complaint But we are Witnesses By Signature.

SWORN AND SUBSCRIBED BEFORE ME THIS THE _____ DAY OF _____
2007.

NOTARY PUBLIC

MY COMMISSION EXPIRES _____

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing Motion has been served upon the U.S. District Court, Clerk by placing a copy of the said same in the U.S. mail properly addressed and postage prepaid this the _____ Day of _____ 2007.

REQUEST PERMISSION FROM THE COURT, TO AMEND TO THIS 1983 IN THE FUTURE.

Name Jimmy L. Reeder 153384
Address _____
City _____
Zip Code _____ Phone _____

Name Jimmy L. Reeder
Name TAVARIS Body 234499
Address _____
City _____
Zip Code _____ Phone _____

Name Tavaris Body
Name Vergil Nickens 241724
Address _____
City _____
Zip _____ Phone _____

Vergil Nickens

Name DEDRICK WHITE 205693
Address _____
City _____
Zip _____ Phone _____

DEDRICK WHITE

Name DANIEL IRBY 247981
Address _____
City _____
Zip _____ Phone _____

Name Daniel Irby
Name STANLEY HAILEY
Address _____
City _____
Zip _____ Phone _____

Name Stanley L. Hailey
Name Robert Ray 147104
Address _____
City _____
Zip _____ Phone _____

Name Robert Ray
Name William Cardace
Address _____
City _____
Zip _____ Phone _____

Name William Cardace
Name GREGORY BOYKIN 146170
Address _____
City _____
Zip _____ Phone _____

Gregory Boykin

Name Dandre Harris A's 242676
Address _____
City _____
Zip Code _____ Phone _____

Name Dandre Harris
Name Ruben Douglas A's 247347
Address _____
City _____
Zip Code _____ Phone _____

Name Ruben Douglas
Name Cecil R. Haston A's 248468
Address _____
City _____
Zip _____ Phone _____

Name Cecil R. Haston
Name TROY WATKINS - 133965
Address _____
City _____
Zip _____ Phone _____

Name Troy Watkins
Name Larry McCall 249777
Address _____
City _____
Zip _____ Phone _____

Name Larry McCall
Name _____
Address _____
City _____
Zip _____ Phone _____

Name Travis A. Wilson 242866
Address _____
City _____
Zip _____ Phone _____

Name Travis A. Wilson
Name Don Andre Sanders 215003
Address _____
City _____
Zip _____ Phone _____

Name Don Sanders
Name Berlie C. Moore 240653
Address _____
City _____
Zip _____ Phone _____

Berlie C. Moore

Name Steven Walters #12890
Address _____
City _____
Zip Code _____ Phone _____

Name STEVEN WALTERS
Address _____
City _____
Zip Code _____ Phone _____

Name Jamal Curvingford #208955
Address _____
City _____
Zip _____ Phone _____

Name Anthony Turner #236352
Address _____
City _____
Zip _____ Phone _____

Name Gerald Tillman #247193
Address _____
City _____
Zip _____ Phone _____

Name Montez Humphrey #205478
Address _____
City _____
Zip _____ Phone _____

Name Christopher Battle #249445
Address _____
City _____
Zip _____ Phone _____

Name Marvin Jones #247389
Address _____
City _____
Zip _____ Phone _____

Name Kortney McCloud #241901
Address _____
City _____
Zip _____ Phone _____

Kortney McCloud

Name Corey Bryant #161479
Address _____
City _____
Zip Code _____ Phone _____

Name James Spates #249131
Address _____
City _____
Zip Code _____ Phone _____

Name Raymond J. Digg
Address _____
City _____
Zip _____ Phone _____

Name _____
Address _____
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Name Calvin A. Lee #152056
 Address F.L.Y.C., P.O. Box 220410
 City Deatsville, AL
 Zip Code 36022 Phone _____

Calvin A. Lee
 Name Charles Hicks #246241
 Address F.L.Y.C. P.O. Box 220410
 City Deatsville, AL
 Zip Code 36022 Phone _____

Charles Hicks
 Name Derrick Daniel
 Address Apt 42 Robinwood Dr
 City Alexander AL
 Zip 36010 Phone 750-3851

Name Marquise Jarrells #229142
 Address FLYC P.O. Box 220410
 City Deatsville, Ala
 Zip 36022 Phone _____

Name Zett Collier Jr #248545
 Address FLYC P.O. Box 220410
 City Deatsville ALA
 Zip 36022 Phone _____

Name Edgar Miller #208355
 Address _____
 City _____
 Zip _____ Phone _____

Name Raymond K. Wright 233605
 Address _____
 City _____
 Zip _____ Phone _____

Raymond K. Wright
 Name _____
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